

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TN  
WESTERN DIVISION

MYRON BASS

VS

CASE NO.

PLAINTIFF

RECEIVED  
THURSDAY, OCT 29, 2015  
CLERK U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

D DEFENDANTS

DELTA MEDICAL

HOSPITAL and

Charge Nurse TONYA  
Individually & Professionally

COMPLAINT

JURY DEMAND

Now Comes Myron Bass, Plaintiff, and  
sues the Defendants listed supra for reasons  
stated below:

JURISDICTION

Jurisdiction is based on Diversity of Citizenship.  
Plaintiff is a resident of the state of Arkansas,  
Defendant Delta Medical Hospital is a resident  
or its location is in the state of Tennessee and  
Defendant Tonya is a resident of Tennessee.  
The amount of controversy is over \$150,000.

## VENUE

Venue is pursuant to the Federal Venue Statute and the acts complained of occurred with the city of Memphis, State of Tennessee which is within the venue of this Court.

## PARTIES

1. Myron Bass, hereinafter called Plaintiff seeks a civil remedy for actions complained herein.
2. Delta Medical Hospital is a business located at 3000 Getwell Memphis, TN and hereinafter referred to as Defendant DMH.
3. Tonya, hereinafter referred to as Defendant Tonya, is a nurse employed by Defendant DMH. Plaintiff is unaware of her surname but will obtain such during discovery for the purpose of service of process her work address is 3000 Getwell Memphis, TN 38118

## ACTS COMPLAINED OF

4. On Friday, October 2<sup>nd</sup>, 2014 Plaintiff was improperly transferred to Defendant DMH from the Veterans Hospital for medical care.
5. It is the belief of Plaintiff that Acadia now owns Defendant DMH but due to Plaintiff's limited access to research actually No access to research much data must be obtained when discovery is permitted.

6. Upon arrival at Defendant DMH Plaintiff was suffering from a gout episode in his ~~left~~<sup>right</sup> foot and knee, which was untreated.
7. Plaintiff's gout episode worsen and walking was extremely painful, slow and actually impossible.
8. Plaintiff requested to see a medical doctor, which was denied.
9. Plaintiff requested a wheelchair, which was denied.
10. Plaintiff had to ~~squat~~ on his buttocks to get around.
11. Plaintiff alleges that he was a victim of patient abuse when denied pain meds.
12. Defendant Tonya was in charge and denied Plaintiff's requests and actually taunted and laughed loudly at Plaintiff.
13. Plaintiff alleges that he was denied the rights and responsibilities due to him by Defendants.
14. Plaintiff alleges that Defendants are guilty of Patient Abuse.
15. Plaintiff will ~~not~~<sup>MB</sup> amend his complaint upon release ~~MB~~ from Defendants and has access to research unless appointed an attorney.

16. Plaintiff was physically abused by a defendant DMT through an employee.
17. Plaintiff alleges patient abuse.

Wherefore, Plaintiff prays that he is granted the following relief:

1. That proper process be issued upon Defendants requiring them to Answer or otherwise plea
2. That Plaintiff be appointed an attorney to represent him during this case due to the fact he is a patient at Defendant DTM and has NO access to legal research,
3. That Plaintiff be awarded \$150,000 from each Defendant for assault as Compensatory Damages
4. That Plaintiff is awarded \$150,000 in Punitive damages
5. And all other relief that is just and necessary.

Respectfully  


Myron Bass, Patient  
3600 Getwell

Memphis TN 38118 Page 4 of 4